

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION

JEAN ABELARD and GEUERDA)
ABELARD as Administrators and)
Prosequendum for the Estate of)
MARVEN ABELARD,)
) CIVIL ACTION FILE
Plaintiffs,)
) NO. _____
v.)
)
CLEAN EARTH, INC., SANDVIK,)
INC., AND ABC CORPS 1-10)
(fictitious entities);)
)
Defendants.)
_____)

DECLARATION OF GARY HOHENBERGER

STATE OF Georgia
COUNTY OF Colbert

I, Gary Hohenberger, under penalty of perjury in accordance with 28 U.S.C. § 1746, declare the following facts:

1. I am over the age of eighteen and am not operating under any mental disabilities. Unless otherwise stated, the facts and circumstances set forth herein are based upon my personal knowledge and upon the business records of Sandvik Mining and Construction USA, LLC ("SMC, USA").

2. I am currently employed as a Financial Controller at SMC, USA. I have been employed by SMC, USA since 2008.

3. SMC, USA is a Delaware corporation with its principle place of business in Florida.

4. On or about February 25, 2013, Screen Service Technology, Inc. d/b/a Advanced Equipment/Eastern (“Advanced Equipment”) ordered a QE440 Mobile Scalping Screener Unit (the “Screener”) from SMC, USA. SMC, USA purchased the Screener directly from the manufacturer, Sandvik Construction Mobile Crushers and Screens, LTD, a U.K. entity. *See* Exhibit A, Invoices.

5. Advanced Equipment is a distributor that is unrelated to Sandvik, Inc.

6. Upon information and belief, Advanced Equipment sold the Screener to Clean Earth.


7. Sandvik, Inc. is a corporate entity with the principle function of providing certain administrative services to various Sandvik entities.

8. Sandvik, Inc. had no involvement in the sale of the Screener to Clean Earth.

9. Sandvik, Inc. did not design, manufacture, test, distribute, market, supply, inspect, maintain or repair the Screener at issue.

10. Sandvik, Inc. does not sell, design, manufacture, test, distribute, market, supply, inspect, maintain or repair any Sandvik branded equipment.

I verify under penalty of perjury that the foregoing is true and correct.



Gary Hohenberger
Financial Controller
Sandvik Mining and Construction USA, LLC



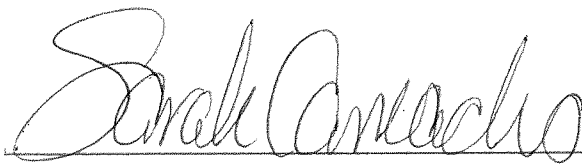
 Notary
Sarah Camacho August 25, 2016

EXHIBIT A



Sandvik Construction
Mobile Crushers and Screens Ltd
Hearthcote Road, Swadlincote, UNITED KINGDOM, DE11 9DU

EMAIL: paul.francks@sandvik.com
WEB: http://www.construction.sandvik.com
COMPANY NO.: 4636796 VAT REG. NO: GB 806 3999 95

TEL: +44 (0)1283 212121 FAX: +44 (0)1283 226935

Invoice to
SANDVIK MINING & CONSTRUCTION USA
300 TECHNOLOGY COURT, SMYRNA
GEORGIA, 30082
UNITED STATES

Deliver to
SANDVIK MINING & CONSTRUCTION USA
300 TECHNOLOGY COURT, SMYRNA
GEORGIA, 30082
UNITED STATES

Invoice copy

Number: INTS003678

VAT reg. no.: NON EU STATE-USA

Payment ID.....:

| Date | Account | Order | Claim No | Del note no | Delivery method | Delivery terms | Currency | Page |
|------------|-----------|---------|----------|--------------|-----------------|----------------|----------|------|
| 25/07/2013 | C4684USDM | M200057 | | SPK0006226_S | | | USD | 1 |

| Serial number | Product account | Category | Transaction text | Quantity | Net amount | Vat amount |
|---------------|-----------------|----------|-------------------------------------|----------|------------|------------|
| SW13184 | 11112 | QE440 | QE440 MOBILE SCALPING SCREENER UNIT | 1.00 | 239,081.00 | 0.00 |

HS Commodity Code.....: UK Commodity Code.....: Commodity Tariff.....: 0.00 Country/region.....:

Oil Spec = Standard
2 Way or 3 Way Split? = 3 Way
Power Pack Type = USA
Bottom Deck Screening Media = SM7020
Language Pack = United States
Screen Box Specification = QE440SB005
Delivery charge to customer

| | | | | |
|---------|----------|------|----------|------|
| SW13184 | Delivery | 1.00 | 9,126.00 | 0.00 |
|---------|----------|------|----------|------|

HS Commodity Code.....: UK Commodity Code.....: Commodity Tariff.....: 0.00 Country/region.....:

VAT Analysis

| Code | Rate | Goods Value | VAT Value |
|-------------------------------------|------|-------------|-----------|
| | | 248,207.00 | 0.00 |
| Tax-free exports to third countries | | | |

Due date: 29/09/2013

Bank: NORDEAUSD
Sort code.....: IBAN
Account number...: 6849137
IBAN: SE9295000099603406849137

| | |
|-----------------|----------------|
| Total Goods: | 248,207.00 |
| Total discount: | 0.00 |
| Total Vat: | 0.00 |
| Total Payable: | 248,207.00 USD |

**INVOICE****COPY**

| | | |
|---|--|---------------------|
| Invoice number B165780 | Customer number XXSCR3/000 | Page 1(1) |
| Invoice date 07/31/2013 | Buyer's reference EQ11152012-1 | |
| Contact person Ronnee Balliet | Order number 0731429 | |

Buyer (if other than consignee)
SCREEN SERVICE TECHNOLOGY INC.
DBA: ADVANCED EQUIPMENT/EASTERN
22 NEALY BLVD
TRAINER PA, 19061
USA

Consignee
SCREEN SERVICE TECHNOLOGY INC.
DBA: ADVANCED EQUIPMENT/EASTERN
22 NEALY BLVD
TRAINER PA, 19061
USA

Customer VAT ID

Delivery from
USA
Sales person
Ronnee Balliet
Despatch method
PICK-UP
Supplier order no

Delivery from
ME - New Rig Inventory

Place of invoice issue
United States
Sales area
USA & Canada
Order date
02/25/2013
Despatch note no
00

Terms of delivery (Incoterms 2010)

DDP TRAINER PA, INCOTERMS 2010
Delivery date
07/31/2013
Payment due date
08/30/2013
Terms of payment
30 days net from invoice date
Payment method
check

Salesman
HOUSE
Carrier
Customer Pickup

| Line | Item number | Quantity | Uom | Unit | Amount |
|------|-------------|---------------------------------|--------|------------|------------|
| Our | Cust | Description | | | USD |
| | | ENTERED BY RONNEE BALLIET | | | |
| | | QE440 | | | |
| | | SN: 1886SW13059 | | | |
| | | CUSTOMER PICK UP AT NEWARK PORT | | | |
| 1 | | QE440 | 1 each | 239 000.00 | 239 000.00 |
| | | QE440 MOBILE SCALPING SCREEN | | | |
| | | *** Lot List *** | | | |
| | | 1886SW13184 | 1 | | |
| | | *** End of Lot List *** | | | |

| | |
|--------------------|-------------------|
| Goods total | 239 000.00 |
| Sales Tax | 0.00 |
| Others | |
| Total | 239 000.00 |

Contact
Sandvik Mining and Construction USA, LLC

✉ ronnee.balliet@sandvik.com

Sandvik Mining and Construction USA, LLC
Company code: 4684
Dept CH-10576
Palatine, IL 60055-0576
USA
Phone: +1 404-589-3800
Fax: +1 404-589-2900

Wire Transfer Funds:
Nordea Bank Finland Plc-New York Branch
437 Madison Avenue
New York, NY 10022
USA

Acct# 4010343001
ABA# 026010786
Swift Code: NDEAUS3N